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March 26, 2025

**VIA ELECTRONIC FILING**

Hon. Mae A. D'Agostino  
United States District Court  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, New York 12207

Re: *John Doe v. Cornell University; C.A. No. 3:25-cv-00357 (MAD/ML)*

Dear Honorable Judge D'Agostino:

The undersigned is counsel to the Plaintiff John Doe in the above captioned matter. We write to submit this joint request for a postponement of the upcoming hearing on Plaintiff's motion for temporary restraining order and preliminary injunction (ECF No. 3) as well as the deadlines for the Parties' briefing in response to the motion. The Plaintiff filed his complaint, motion for temporary restraining order, and motion for pseudonym on March 21, 2025. On the same date, the Court issued the following deadlines:

- Defendant Cornell University's oppositions to the motion for temporary restraining order and motion for pseudonym are due by March 26, 2025 at 4:00 p.m.
- Plaintiff's reply briefs in further support of his motion for temporary restraining order and motion for pseudonym are due by March 27, 2025 at 12:00 p.m.
- The Order to Show Cause hearing is scheduled for March 27, 2025 at 2:00 p.m.
- The Parties are to confer and submit a joint proposed protective order to the Court prior to the hearing on March 27, 2025 at 2:00 p.m.

Subsequent to the filing of Plaintiff's papers, counsel for the Parties have engaged in good faith settlement discussions, in an effort to fully resolve this matter. In an effort to allow the Parties additional time to explore resolution and finalize settlement terms, counsel jointly respectfully request that the upcoming deadlines and hearing be adjusted as follows:

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- Defendant Cornell University's oppositions to the motion for temporary restraining order and motion for pseudonym are due by April 16, 2025 at 4:00 p.m.
- Plaintiff's reply briefs in further support of his motion for temporary restraining order and motion for pseudonym are due by April 17, 2025 at 12:00 p.m.
- The Order to Show Cause hearing is scheduled for April 17, 2025, at a time of the Court's convenience.
- The Parties are to confer and submit a joint proposed protective order to the Court prior to the hearing on April 17, 2025.

Counsel for Defendant Cornell University is in agreement with the foregoing request.

Respectfully Submitted,

NESENOFF & MILTENBERG, LLP

/s/ Tara J. Davis

Tara J. Davis, Esq.

cc: Valerie Cross-Dorn (via email)  
Adam Pence (via email)

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